

No. 23-12350

**IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

SYED IBRAHIM HUSSAIN, et., al.
Plaintiffs/Appellants

v.

H. JAMES STADELMAN, et., al.
Defendants/Appellees

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA,
Orlando Division

6:22-CV-1886-CEM

**APPELLANTS' EMERGENCY MOTION FOR 28-DAY EXTENSION TO
FILE PETITION FOR REHEARING**

SYED I. HUSSAIN SYED M. B. HUSSAIN
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**CERTIFICATE OF INTERESTED PERSONS AND
CORPORATE DISCLOSURE STATEMENT**

Plaintiffs-Appellants certify that the following is a complete list of interested persons as required by Federal Rule of Appellate Procedure 26.1 and Eleventh Circuit Rule 26.1:

1. Alliance for Justice, *Related Party*
2. Allied Command Operations (ACO), *Related Party*
3. Allied Command Transformation (ACT), *Related Party*
4. American Association of Retired Persons, *Related Party*
5. American Bar Association, *Related Party*
6. Banker Lopez Gassler P.A., *Attorneys for Defendant/Appellee*
7. Bloom, Jonathan, *Defendant/Appellee*
8. Brennan Center for Justice, *Related Party*
9. Bureau for Humanitarian Assistance, *Related Party*
10. Burr & Forman LLP, *Attorneys for Defendants/Appellees*
11. Cato Institute, *Related Party*
12. Center for Constitutional Rights – *Related Party*
13. Center for Public Integrity – *Related Party*
14. Central Intelligence Agency – Homeland Security Mission Center (HSMC)
– *Related Party*
15. Department of Justice – Disability Rights Section – *Related Party*

16. Department of Justice – Civil Rights Division – *Related Party*
17. European Union, *Related Party*
18. Families Civil Liberties Union (FCLU) – *Related Party*
19. Family Medicine & Rehab, Inc., *Appellee*
20. FBI – Critical Incident Response Group – *Related Party*
21. FBI – Public Corruption Campaign – Florida – *Related Party*
22. FBI – Real Property Fraud – Criminal Investigative Division (CID) –
Related Party
23. FBI – Real Property Fraud – Financial Crimes Section - *Related Party*
24. FBI – Real Property Fraud – Financial Institution Fraud Unit (FIFU) –
Related Party
25. Federal Emergency Management Agency – *Related Party*
26. Federalist Society – *Related Party*
27. Florida Department of Business and Professional Regulation – *Related Party*
28. Freedom House, *Related Party*
29. Front Line Defenders, *Related Party*
30. Gassler, Frank H., *Attorney for Defendant/Appellee*
31. Global Health Advocates, *Related Party*
32. Global Rights, *Related Party*
33. Global Witness, *Related Party*

34. Guex, Brian, *Plaintiff/Appellant*
35. Guex, Roselene, *Plaintiff/Appellant*
36. Gunn, V., L. Delton, *Attorney for Defendant/Appellee*
37. Health Action International, *Related Party*
38. House Committee on Homeland Security – Counterterrorism, Law Enforcement, and Intelligence – *Related Party*
39. House Committee on Homeland Security – Emergency Management and Technology – *Related Party*
40. House Oversight and Reform Committee – *Related Party*
41. Human Rights Foundation, *Related Party*
42. Human Rights Watch, *Related Party*
43. Hussain, Syeda Sara, *Plaintiff/Appellant*
44. Hussain, Syed Ibrahim, *Plaintiff/Appellant*
45. Hussain, Syed Muhammad Baqir, *Plaintiff/Appellant*
46. Hussain, Syed Sajid, *Defendant/Appellee*
47. Infrastructure Security Partnership (TISP), *Related Party*
48. International Commission of Jurists, *Related Party*
49. International Federation of the Red Cross and Red Crescent Societies, *Related Party*
50. International Federation for Human Rights (FIDH), *Related Party*

- ~~51.~~ International Rehabilitation Council for Torture Victims (IRCT), *Related Party*
52. Interpol, *Related Party*
53. Interval Title Services, Inc., *Defendant/Appellee*
54. Jacksonville Affordable Contracting, LLC, *Related Party*
55. John F. Kennedy Library Foundation, *Related Party*
56. Judicial Watch, *Related Party*
57. Jupiter Properties, Inc., *Defendant/Appellee*
58. L’Institut Pasteur, *Related Party*
59. Lawyers’ Committee for Civil Rights Under Law – *Related Party*
60. Marks, Howard S., *Attorney for Defendant/Appellee*
61. Médecins Sans Frontières, *Related Party*
62. Mendoza, Hon. Carlos E., *U.S. District Judge*
63. Muneer, Khalid – *Defendant/Appellee*
64. National Center on Elder Abuse – *Related Party*
65. National Clandestine Service – *Related Party*
66. National Institute on Aging – *Related Party*
67. National Lawyers Guild (NLG) – *Related Party*
68. National Organization for Victim Assistance – *Related Party*
69. National Security Branch of the FBI – *Related Party*

- 70.^{ss/} Nobel Foundation – *Related Party*
71. North Atlantic Treaty Organization – *Related Party*
72. Office of the Director of National Intelligence – *Related Party*
73. Office of Global Analysis – *Related Party*
74. Pharmaceutical Accountability Foundation – *Related Party*
75. PhRMA – *Related Party*
76. Physicians for Human Rights – *Related Party*
77. Price, Hon. Leslie Hoffman, *U.S. Magistrate Judge*
78. Prime International Properties Clay, LLC, *Defendant/Appellee*
79. Prime International Properties Duval, LLC, *Defendant/Appellee*
80. Prime International Properties, LLC, *Defendant/Appellee*
81. Public Citizen, *Related Party*
82. Reason Foundation, *Related Party*
83. Reporters Sans Frontières, *Related Party*
84. Réseau International des Droits Humains (RIDH)
85. Saint Catherine’s Catholic Church Orange Park, *Related Party*
86. Secours Populaire Français, *Related Party*
87. Senate Homeland Security and Governmental Affairs Committee – *Related Party*
88. Senate Judiciary Committee – *Related Party*

89. Sessions, II, Jerry Ladelle – *Defendant/Appellee*
90. Stadelman, H. James – *Appellee*
91. State-Federal Catastrophic Disaster Response Working Group – *Related Party*
92. Thakrar, Sheena A. – *Attorney for Defendant/Appellee*
93. Torture Abolition and Survivors Coalition International (TASSC) – *Related Party*
94. Transparency Life Sciences, *Related Party*
95. Transparency International, *Related Party*
96. United Nations Office on Drugs and Crime – *Related Party*
97. United Nations Office on Genocide Prevention and the Responsibility to Protect (OSAPG), *Related Party*
98. United Nations Office of the High Commissioner for Human Rights (OHCHR) – *Related Party*
99. Walter Reed National Military Medical Center – *Related Party*
100. White-House-led Atrocity Task Force – *Related Party*

CORPORATE DISCLOSURE STATEMENT

To Appellants' knowledge, there are no entities whose publicly-traded stock, equity, or debt may be substantially affected by the outcomes of this petition.

Respectfully submitted this 14th of July 2025.

/s/ *Syed A. Hussain*

SYED IBRAHIM HUSSAIN
mms-renovation@outlook.com

By our individual signatures below, we Co-Appellants affirm in our individual capacities that, to our knowledge, the list of interested persons and the Corporate Disclosure Statement depicted above are accurate and complete.

/s/ *Syeda S. Hussain*

SYEDA SARA HUSSAIN
daughterofamerica12.25.21@gmail.com

/s/ *Syed M. B. Hussain*

SYED MUHAMMAD BAQIR HUSSAIN
baqrehabalt@yahoo.com

**IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

Appeal No. 23-12350

Syed Ibrahim Hussain, et al. — Appellants

v.

H. James Stadelman, et al. — Appellees

**EMERGENCY MOTION FOR 28-DAY EXTENSION OF TIME TO
FILE PETITION FOR PANEL REHEARING AND/OR
REHEARING EN BANC**

(Fed. R. App. P. 26(b); 11th Cir. R. 27-1(c))

The Court entered judgment on **1 July 2025** affirming dismissal of Appellants’ appeal. Under Fed. R. App. P. 40(a)(1) the petition for rehearing is due **15 July 2025**. Appellants Syed Ibrahim Hussain (“Mr. Ibrahim”), joined in for relief sought by Appellants Syed Muhammad Baqir Hussain (“Mr. Baqir”) and Syeda Sara Hussain (“Ms. Sara”), hereby move Pro Se to request a **28-day extension to 12 August 2025**. Eleventh Circuit Rule 27-1(c) authorizes the Clerk to grant up to 28 days for good cause without panel action (11th Circuit published IOP and guidance as to Rule 27-1(c)).

I. URGENCY AND BASIS FOR REQUEST

Appellants bring this motion under emergency circumstances, supported by verified filings already on record, and arising from:

1. **Excusable neglect and procedural obstruction** following reinstatement of the appeal on March 3, 2025;
2. Appellants' **documented disability status and pro se limitations** under ADA Title II protections;
3. Material **obstruction of access to the Court** caused by prior Clerk actions and record fragmentation;
4. The **substantial volume of verified and uncontested evidence** Appellants must synthesize and prepare to meet the legal standard required for rehearing and/or en banc review.

Appellants have exercised **diligent effort** despite being disabled, pro se, and procedurally impaired by the record state in which the appeal was reinstated. Submissions already made span over 1,000 pages of verified declarations, procedural records, and factual attachments—some of which were delayed or obstructed due to prior administrative misrouting.

II. APPLICABLE STANDARD

Federal Rule of Appellate Procedure 26(b) permits the Court, **for good cause shown**, to extend the time to file a petition for rehearing.

Additionally, Eleventh Circuit Rule 26-1 provides that such requests **must be received on or before the due date**, which is **Tuesday, July 15, 2025**.

“Excusable neglect” includes delays caused by the actions or omissions of others, especially where a litigant proceeds in good faith and no prejudice to the opposing party exists. See **Pioneer Inv. Servs. Co. v. Brunswick Assocs. Ltd. P’ship**, 507 U.S. 380 (1993).

III. GOOD CAUSE AND EXCUSABLE NEGLIGENCE

Appellants satisfy both standards due to:

- Clerk-originated **procedural defects** that fractured the record and withheld emergency filings post-reinstatement;
- Medical and psychological hardship arising from **verified disabilities**, in a case that includes evidence of over 45 blocked filings and multiple life-threatening events;
- Active preparation of a complex Petition supported by **statutory, constitutional, and international law**, along with Supreme Court and circuit-level precedent;
- Absence of any bad faith or delay tactics: Appellants filed emergency motions, declarations, and correspondence **promptly and repeatedly** throughout the case timeline;
- **No prejudice to Appellees**, who have not responded to any recent motions and who have been properly served and aware of Appellants’ filing intentions.

IV. PRAYER FOR RELIEF

WHEREFORE, Appellants respectfully request that this Court:

1. **Grant a 28-day extension** of the deadline to file a Petition for Rehearing and/or Rehearing En Banc, from **July 15, 2025** to **August 12, 2025**;
2. Enter such **further relief as may be just and proper** to ensure Appellants' access to a meaningful appellate process.

V. RESERVATION OF RIGHTS

This motion is filed **solely** pursuant to **FRAP 26(b)**.

Appellants otherwise preserve all rights to file under **FRAP 35**, **FRAP 40**, and applicable constitutional and statutory law.

Respectfully submitted this 14th of July 2025.

/s/ Syed I. Hussain

SYED IBRAHIM HUSSAIN
mms-renovation@outlook.com

Appellants Syed Muhammad Baqir Hussain (“Mr. Baqir”) and Syeda Sara Hussain (“Ms. Sara”) concur in the relief sought by this motion as per their signature below.

/s/ Syed M. B. Hussain

SYED MUHAMMAD BAQIR HUSSAIN
baqrehabalt@yahoo.com

/s/ *Syeda S. Hussain*

SYEDA SARA HUSSAIN

Daughterofamerica12.25.21@gmail.com

CERTIFICATE OF COMPLIANCE

1. This document complies with the type-volume and word-count limits of Fed. R. App. P. 27(d) because, excluding the parts of the document exempted by Fed. R. App. P. 32(f), this document contains 799 words.
2. This document complies with the typeface and type-style requirements of Fed. R. App. P. 27(d) because this document has been prepared in a proportionally spaced typeface using Microsoft Word in 14-point Georgia font.

/s/ Syed A. Hussain
Syed Ibrahim Hussain

CERTIFICATE OF SERVICE

I hereby certify that on this 14th of July 2025, a true copy of the foregoing motion and its associated exhibits was filed electronically with the Clerk of Court using the Court's CM/ECF system, which will send by e-mail a notice of docketing activity to the registered Attorney Filers listed on the attached electronic service list.

/s/ Syed I. Hussain
Syed Ibrahim Hussain

ELECTRONIC SERVICE LIST

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